

**REMARKS/ARGUMENTS**

Claims 1-5 stand in the present application. Reconsideration and favorable action is respectfully requested in view of the following remarks.

In the Office Action, the Examiner has rejected claims 1-5 under 35 U.S.C. § 103(a) as being unpatentable over Hardy et al. ("Hardy") in view of Cool. Applicants respectfully traverse the Examiner's § 103 rejection of the claims.

Applicant's invention solves the problem cited at page 2, lines 5-9 of the present application. Essentially, the problem with prior-art "electronic bill images" was that once the electronic bill image was generated, the data used in generating derived information (e.g., total discount owing to the customer joining in some discount scheme, or total charges for calls of a particular type) included in the electronic bill image could not be easily accessed or edited. Hence, if a customer queried a bill, there was no way the customer or, e.g., a call center agent looking at the bill, could explain how the derived information had been arrived at, or modify that derived information to answer a complaint from the customer. The only exception to this was where the information was presented in textual form on the bill.

Applicant's solution to this problem is set out in present claims 1-5, and involves keeping within the electronic bill image: a) records having charge type identifiers; and b) data structures which can be populated by the records in dependence on those charge type identifiers. Present claims 1-5 further require editing the records held within the data structures prior to generating a modified bill on the basis of those edited records in the data structures.

Thus, it is relatively straightforward to go from the bill seen by the customer and customer service agent, to disassemble it to its constituent records, to edit one or more of those records, and then to re-assemble an electronic bill image which answers whatever complaint caused the customer to get in touch with the customer service agent.

Hardy simply doesn't provide this facility. What Hardy does is actually neatly captured on page 4 of the present application. Hardy repeatedly makes the point that the bill data placed on the diskette exactly corresponds to the paper bill sent to the customer – that's why claim 1 ends with the words "said exact charges actually billed to the user." See also, column 30, lines 34 to 50 of Hardy (which emphasizes this point). There is no suggestion in Hardy that the data representing the paper bill is in any way editable by an operator – if it were, it would be necessary to provide a facility for editing the data provided to the diskette(s) mailed to the customer. No such editing facility is disclosed anywhere in Hardy.

The passage in Hardy cited by the Examiner has nothing to do with "electronic bill images" – i.e., data which represents the visual appearance of the bill sent to the customer. It instead concerns how Hardy overcomes the problem of going from the 9-track magnetic tape reels on which the service bureau's mainframe computer stores data, to the 5.25 inch diskettes used by personal computers at the time (basically Hardy uses a personal computer which has a nine-track tape reader as a peripheral).

The discussion of Hardy at page 4 of the present application ends with the statement: "There is thus no processing of a telephone bill image, nor is there any disclosure of using charge type identifiers on bills." This statement is exactly correct.

The other reference relied on by the Examiner, Cool, is also discussed in the present application – in the last paragraph of page 3. The discussion of Cool in the present application ends with the statement: “The disclosure is not concerned with editing bill images and there is no disclosure of using charge type identifiers on bills.” Again, this statement is exactly right.

The passage cited by the Examiner at column 5, lines 16-63 includes lines 45-52 which state the “software system . . . gives . . . the ability . . . to decide which data is to be output in a charging detailed record and the representation of that output.” Applicant submits that this has nothing to do with “editing one or more records held in the data structures” – as required by the present claims – but instead refers to the format of the data in terms of what fields are present in each record at what bit/byte positions. The Examiner’s only other cited passage in Cool is to column 13, lines 37-49 which merely mentions other types of commands used in the system. There is no suggestion that any of those commands give the user any editing control over the visual representation of the bill.

Neither Hardy nor Cool teaches keeping within the electronic bill image:

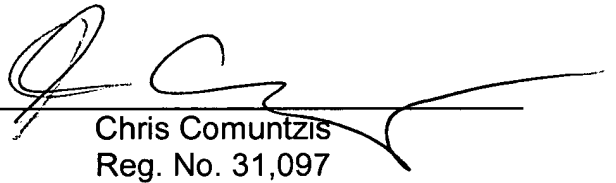
a) records having charge type identifiers; and b) data structures which can be populated by the records in dependence on those charge type identifiers. The cited references also fail to teach or suggest editing the records held within the data structures prior to generating a modified bill on the basis of those edited records in the data structures. Accordingly, the cited art taken singly or in combination fails to render the present claims 1-5 obvious.

In view of the above remarks, it is respectfully requested that the application be reconsidered and that all of claims 1-5, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

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